

From: "Coffey, Scott" <CoffeySE@cdmsmith.com>
To: "Sheldrake, Sean" <sheldrake.sean@epa.gov>
"Zhen, Davis" <Zhen.Davis@epa.gov>
younghs@cdmsmith.com
"Fox, Mary" <FoxML@cdmsmith.com>
Date: 5/8/2018 10:00:59 AM
Subject: RE: April 17 Email About QAPP delib2

Is that a no-go on their new revised "line of evidence" language? I realize it's not a desirable data use statement, but not sure we can push on that at this point since it is consistent with the AOC Work Plan. We do have a statement in the Work Plan that I think covers EPA from interpretation abuses (extracted below).

PDI Work Plan, page 5:

The Parties to the ASAOC agree that, notwithstanding the stated objectives under this agreement/work plan, nothing precludes the Pre-RD Group from using the data collected pursuant to this agreement/work plan as it sees fit to support interpretations of site conditions. The Pre-RD Group may, at its election, present such data and interpretations to EPA for consideration, and EPA will consider such data and interpretations. EPA makes no advance representation as to EPA's acceptance of such interpretations.

From: Sheldrake, Sean <sheldrake.sean@epa.gov>
Sent: Tuesday, May 08, 2018 9:50 AM
To: Coffey, Scott <CoffeySE@cdmsmith.com>; Zhen, Davis <Zhen.Davis@epa.gov>; Young, Howard S. <younghs@cdmsmith.com>; Fox, Mary <FoxML@cdmsmith.com>
Subject: RE: April 17 Email About QAPP delib2

Thanks Scott. Correct, their language is a no go for me. S

Sean Sheldrake RPM, Unit Diver Officer
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 155, M/S DOC-01
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
<https://www.epa.gov/scientific-diving>
<https://www.facebook.com/EPADivers>
<https://www.epa.gov/superfund/portland-harbor>

From: Coffey, Scott [<mailto:CoffeySE@cdmsmith.com>]
Sent: Tuesday, May 8, 2018 9:47 AM
To: Zhen, Davis <Zhen.Davis@epa.gov>; Young, Howard S. <younghs@cdmsmith.com>; Fox, Mary <FoxML@cdmsmith.com>
Cc: Sheldrake, Sean <sheldrake.sean@epa.gov>
Subject: RE: April 17 Email About QAPP

OK. Too bad it is cancelled now. I just prepared for it with Mary Lou (our QAPP subject matter expert).

Hopefully Ken reschedules soon so that we can get the remaining issues resolved with him. It will be good to get their updated RLSO with the revisions they say they are going to make in their email below, that might allow us to review and accept their changes on the remaining comments (except the summing rules)

RE #21 – it's related to both the FSP and QAPP. The problem is their narrative stating the sediment trap data can be used to estimate loading, which our subject matter experts disagree with. According to the Pre-RD Group response below, they will revise the statement to say that the sed. trap data can be used as a line of evidence to help refine

sediment loading. I don't believe we're super comfortable with this language, but this data use was debated extensively during negotiations and we ended up with the "line of evidence" language in the AOC/work plan (see extracted language below), so I think we have to accept their proposed revision.

Sediment Traps

Sediment traps will be deployed to provide a line of evidence on incoming sediment load to the Site that targets fine-grained, more mobile suspended sediment, and higher-TOC material that is more likely to move downstream and be deposited at the Site.

From: Zhen, Davis <Zhen.Davis@epa.gov>
Sent: Tuesday, May 08, 2018 8:49 AM
To: Coffey, Scott <CoffeySE@cdmsmith.com>; Young, Howard S. <younghs@cdmsmith.com>
Cc: Sheldrake, Sean <sheldrake.sean@epa.gov>
Subject: FW: April 17 Email About QAPP

Scott and Howard, for your review is Ken's answers. He has a conflict now, we will cancel the meeting. He had a question as to whether No. 21 is related more to FSP instead of QAPP. He will send over additional changes later today as well.

Thanks,

Davis Zhen, Manager
Site Cleanup Unit 2
Office of Environmental Cleanup
1200 Sixth Avenue Suite 155
M/S ECL 122, Seattle, WA 98101
Tel: (206) 553-7660
Cell: (206) 437-5826

From: Tyrrell, Ken [<mailto:ken.tyrrell@aecom.com>]
Sent: Tuesday, May 08, 2018 8:16 AM
To: Zhen, Davis <Zhen.Davis@epa.gov>
Subject: April 17 Email About QAPP

Davis,

As you requested on April 9, we would like to set up a call to discuss the remaining concerns from EPA regarding the QAPP. However, before we set the call up, we would like to confirm the comments for discussion as there were some comment number errors on the RTC document. You indicated that the comments for discussion are primary comments 6 and 21 and To Be Considered comments 1, 6, and 23. I have copied the comments and our **initial** responses below. Please confirm that these are the correct comments intended for discussion.

Primary Comments

6. Section 6.3.1, page 40, paragraph 3: The last sentence in this section states: "Where summing of the analytical results is required (e.g., total polycyclic aromatic hydrocarbons [PAHs]) the process referenced in Appendix A of the Remedial Investigation /Feasibility Study (RI/FS) report should be followed (EPA 2016a)." Please note, summing rules are being updated by EPA for key constituents. The updated summing rules are attached. The summation of analyte groups must be in accordance with the December 2017 updated rules for summing. The reference for the summing rules must be updated in the QAPP.

Pre-RD AOC Group Response: We need further clarification on the 2017 summing rules prior to adopting them and we look forward to the technical call to continue the discussion.

21. Table 3, Sediment Trap Study: The DQO for sediment traps should not list contaminant loading under Step 5. Sediment trap data can be useful for characterizing suspended sediment entering the site, but the design of sediment traps limits the potential for sediment to be resuspended in the water column once deposited. Therefore, the amount of sediment collected in the sediment trap will be useful for characterizing incoming sediment particles but is not useful for estimating contaminant loading.

Pre-RD AOC Group Response: We disagree. QAPP Table 3 and the DQO Step 5 text regarding use of sediment trap data for contaminant loading evaluations is appropriate.

Step 5 currently says “If sediment trap data indicate elevated concentrations of sediment COCs, the data will be used to refine the CSM; refine understanding of upstream conditions and contaminant loading into the Site for potential recontamination; and further inform remedial action objectives, if appropriate.”

Revised text will state “If sediment trap data indicate elevated concentrations of sediment COCs, the data will be used to refine the CSM; refine understanding of upstream conditions into the Site for potential recontamination; serve as a line of evidence to help refine contaminant loading into the Site for potential recontamination; and further inform remedial action objectives, if appropriate.”

To Be Considered

1. Section 3.3.2, page 12, paragraph 3: Relative percent difference should be discussed in the first paragraph of Section 3.3.2 as it is calculated for two results to compare precision such as matrix spike/matrix spike duplicate (MS/MSD) and laboratory control sample/laboratory control sample duplicate.

Pre-RD AOC Group Response: The QAPP will be revised to move the relative percent difference (RPD) discussion to the first paragraph of Section 3.3.2. Actually once we looked at the flow of the text, it ended up in the second paragraph but meets the intent of the comment.

6. Section 4.1.4, page 19, paragraph 1: It is stated that two sediment traps will be deployed at river mile (RM) 16.2, whereas the FSP for surface water and sediment trap sampling says they will be deployed at RM 16.5. The correct location should be the same in both documents.

Pre-RD AOC Group Response: Section 2.2.2 in the Surface Water/Sediment Trap FSP will be revised to state that the two sediment traps will be deployed at RM 16.2 such that the RM listed is consistent with Section 4.1.4 of the QAPP.

22. (this one should have been numbered 23) Figure 2: Figure 2 is not labeled “Figure 2” and the figure should list the “Pre-RD AOC Group” members in the box.

Pre-RD AOC Group Response: These corrections, labeling of Figure 2 and listing members in the Pre-RD AOC Group box, will be made in Figure 2.

Ken Tyrrell

Project Coordinator – Portland Harbor
Design and Consulting Services Group
M +281-224-2793
ken.tyrrell@aecom.com

AECOM

1111 Third Avenue
Seattle, WA 98101
T +206-438-2700
www.aecom.com